

EDMS # 46250382

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
TERRA MISSISSIPPI NITROGEN, INC. - DONALDSONVILLE PLANT, AI 2245
PROPOSED NO_x EMISSION REDUCTION CREDITS (ERC)

Terra Mississippi Nitrogen, Inc., 39139 Highway 18 West in Donaldsonville, Ascension Parish, LA 70346, Air Permit Number 0180-00009-V0, proposes to add emission reductions credits (ERC) of NO_x to the LDEQ Emission Reductions Credits Banking System. This action is due to the permanent shutdown of Urea Boiler No. 1 and Urea Boiler No. 2 at the Donaldsonville Plant, an ammonia fertilizer manufacturing facility, on December 24, 2004.

The total estimated emission reductions, in tons per year (TPY) are as follows:

	Urea Boiler No. 1	Urea Boiler No. 2
Allowable emissions before reduction:	173.4	150.8
Actual emissions (2001/2002 average) (§607.C.2):	127.5	121.5
Baseline emissions (§607.C.4):	101.41	97.93
Allowable emissions after reduction (§607.C.5):	0.00	0.00
Surplus emission reduction (§607.C.6):	101.41	97.93
Adjustments for netting (§607.D):	-0	-0
Total ERC*:	101.41	97.93
Ozone Season ERC	27.36	27.36
Non-ozone Season ERC	74.05	70.57

* Total ERC = ozone season ERC + non-ozone season ERC.

The Department is hereby providing notice of its determination that the reductions are surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6 as of the date of this notice.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this proposed emissions reduction may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, April 19, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The ERC application, draft certificate, and Analysis of Validity of Emission Reductions as ERC are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the Ascension Parish Library-Donaldsonville Branch, 500 Mississippi Street, Donaldsonville, LA 70346.

Inquiries or requests for additional information regarding this permit action should be directed to John H. Dyer, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3005.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access draft certificate, and Analysis of Validity of Emission Reductions as ERC can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 2245, Permit Number 0180-00009-V0, and Activity Number PER20050012.

Scheduled publication date: Thursday, March 18, 2010

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest (AI) No.: 2245
Activity No.: PER20050012

Richard Bartley
Facility Manager
Terra Mississippi Nitrogen, Inc.
P.O. Box 310
Donaldsonville, LA 70346-0310

RE: NO_x Emission Reduction Credits, Terra Mississippi Nitrogen Inc. - Donaldsonville Facility,
Terra Mississippi Nitrogen Inc., Donaldsonville, Ascension Parish, Louisiana

Dear Mr. Bartley:

Please find enclosed your Emission Reduction Credit (ERC) Certificate to reflect the creditable NO_x reductions generated by permanently shutting down Urea Boiler No. 1 (EIQ No. ID-30) and Urea Boiler No. 2 (EIQ No. ID-32) at the Donaldsonville Plant.

A notice requesting public comment on the ERC Certificate was published in both *The Advocate* and the *Gonzales Weekly* on March xx, 2010. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on March xx, 2010. XX comments were received.

If you have any questions, please call John H. Dyer of the Air Permits Division at (225) 219-3005.

Sincerely,

FOR
Public Notice
only

CSN:JHD



Louisiana Department of Environmental Quality Emission Reduction Credit Certificate

Item Number: 2245PER20050012
Owner: Terra Mississippi Nitrogen Inc
Phone number: (225) 474-4650
Company Address: P.O. Box 310
Donaldsonville, Louisiana 70346-0310

EMISSION REDUCTION INFORMATION

Physical Location: 39139 Highway 18 W, Donaldsonville, Ascension Parish, Louisiana

Method of ERC creation: Permanent Shutdown of Urea Boiler No. 1 (EIQ ID-30) and Urea Boiler No. 2 (EIQ ID-32) at the Donaldsonville Plant (Activity Number PER200500012)

Pollutant: NO_x (tons)

O ₃ NO _x Generated	54.72
Non O ₃ NO _x Generated	<u>144.62</u>
TOTAL NO _x Generated	199.34

Date of emission reduction: December 24, 2004

Permit Number: 0180-00009-V0

Assistant Secretary

Date

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

DONALDSONVILLE PLANT TERRA MISSISSIPPI NITROGEN, INC DONALDSONVILLE, ASCENSION PARISH, LOUISIANA AI NO. 2245, ACTIVITY NO. 20050012

Background

Terra Mississippi Nitrogen, Inc. (Terra), a wholly owned subsidiary of Terra Industries, owns and operates an anhydrous ammonia plant located at 39139 Highway 18 West, Donaldsonville, in Ascension Parish, Louisiana. Previously, the site was owned and operated as two facilities: 1) a melamine plant owned by Melamine Chemicals, a subsidiary of Borden Chemicals, and 2) two ammonia plants and a urea plant owned by Triad Nitrogen. Triad Nitrogen acquired the melamine plant in 2003, and the two adjacent facilities came under common control. Terra purchased the Donaldsonville facility on December 21, 2004.¹

Shortly after purchasing the Donaldsonville Plant, Terra shut down the melamine unit, the urea unit, and one of the two anhydrous ammonia units. The melamine facility had been operating under AI 2398, Permit No. 0180-00005-V0, issued November 28, 2001, and administratively amended May 22, 2003.² The ammonia and urea units were operating under AI 2245, Permit No. 0180-00009-V0, issued January 11, 2001.³

From the shutdown of the ammonia unit (Ammonia Plant No. A-1), Terra is proposing to transfer NO_x emission credits generated by Ammonia No.1 Primary Reformer (Emission Point No. ID-06). From the shutdown of the urea unit, Terra is proposing to transfer NO_x emission credits generated by Urea Boiler No. 1 (Emission Point No. ID-30) and Urea Boiler No. 2 (Emission Point No. ID-32). An analysis of the validity of NO_x emission credits generated by the reformer has already been issued and was public noticed on April 7, 2005.⁴ At that time, 262.34 tons of NO_x emission credits were transferred, leaving a balance of 939.22 tons (901.5 non-O₃ season + 37.72 O₃ season) for the No. 1 Primary Reformer (EPN ID-06).⁵ The department examined this analysis to determine if an update was warranted and confirmed its validity. Therefore, this analysis pertains to the Urea Plant boilers, ID-30 and ID-32, only.

Urea Boilers Nos. 1 and 2 were natural gas-fired steam boilers each with a maximum rating of 149 MM BTU/hr. The boilers were constructed prior to 1984 and were not subject to any federal or state regulations for emissions of NO_x at the time of their shutdown on December 24, 2004.

Summary

A portion of the resultant NO_x emission decrease is surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6-Regulations on Control of Emissions Through the Use of Emission Reduction Credits Banking. Accordingly, these reductions qualify as Emissions Reduction Credits (ERC). Amounts in the following table are given in tons per year (TPY).

¹ See EDMS Document No. 32721306.

² See EDMS Document Nos. 21679020 and 26935829.

³ See EDMS Document No. 18878219.

⁴ See EDMS Document Nos. 32772439 and 32772441.

⁵ See EDMS Document No. 32909458.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITYDONALDSONVILLE PLANT
TERRA MISSISSIPPI NITROGEN, INC
DONALDSONVILLE, ASCENSION PARISH, LOUISIANA
AI NO. 2245, ACTIVITY NO. 20050012Total NO_x ERC:

	Urea Boiler No.1	Urea Boiler No. 2
Allowable Emissions Before Reduction: ⁶	173.4	150.8
Actual Emissions: (O ₃ season + non-O ₃ season) ⁷	(53.45 + 74.05) = 127.5	(50.93 + 70.57) = 121.5
Adjusted allowable emissions (§607.C.3): (O ₃ season + non-O ₃ season) season	(27.36 + 100.71) = 128.07	(27.36 + 87.59) = 114.95
Baseline emissions (§607.C.4): (O ₃ season + non-O ₃ season) ⁸	(27.36 + 74.05) = 101.41	(27.36 + 70.57) = 97.93
Allowable emissions after reduction (§607.C.5):	0.00	0.00
Surplus emission reduction (§607.C.6):	101.41	97.93
Adjustments for netting (§607.D):	-0	-0
Total ERC:	101.41	97.93

Louisiana promulgated a NO_x Reasonably Available Control Technology (RACT) rule (LAC 33:III.Chapter 22) on March 20, 2002. Beginning May 1, 2005, Chapter 22 required sources to reduce NO_x emissions during the five month ozone season, May 1 through September 30, inclusively. Typically, a stationary source reduces emissions below the baseline to generate surplus emission reduction credits. Due to the five month applicability of Chapter 22, the allowable emission limitation for a stationary source could potentially have two values, one for the five month ozone season, and another for the seven-month non-ozone season.

Thus, baseline emissions for a given stationary source, which are used to determine the surplus emission reduction (§607.C.6), could have two different values. In order to accurately determine the amount of ERC that can be used as offsets for nonattainment new source review (NNSR) permitting, baseline emissions and surplus ERC must be determined for the two time periods. Total NO_x ERC for any annual time period will consist of the ERC from the five month ozone season and the ERC from the seven month non-ozone season. Offset requirements for new sources derive from Section 173(a)(1)(A) of the Clean Air Act (CAA), which concerns "total" emissions and does not address the use of emission offsets for nonattainment permitting over periods of less than one year. Therefore, the NO_x ERC to be used in all NNSR permitting under LAC 33:III.504 must be determined by adding the ERC from the ozone season and the non-ozone season.

With respect to all offsets under Chapter 5 and all ERC under Chapter 6, the total NO_x emission increases during the ozone season must be offset by NO_x ERC from the ozone season. Non-ozone season NO_x

⁶ Permit No. 0180-00009-V0 issued 1/11/01

⁷ Average of 2001 and 2002 actual emissions (§607.C.2).

⁸ Baseline emissions shall be the lower of actual emissions or adjusted allowable emissions when the design value for the nonattainment area is not above the NAAQS for ozone (§607.C.4.a.ii); for NO_x, baseline emissions have two values, one for ozone season and one for non-ozone season.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

DONALDSONVILLE PLANT TERRA MISSISSIPPI NITROGEN, INC DONALDSONVILLE, ASCENSION PARISH, LOUISIANA AI NO. 2245, ACTIVITY NO. 20050012

increases may be met by either ozone or non-ozone NO_x ERC. The annual NO_x increase must be offset by the total combination of ozone and non-ozone season surplus NO_x emission reduction credits. See 67 FR 48093-48094 (July 23, 2002).

Ozone (O₃) season NO_x ERC:

	Urea Boiler No.1	Urea Boiler No. 2
Allowable Emissions Before Reduction:	72.69 ⁹	63.21 ¹⁰
Actual Emissions:	53.45	50.93
Adjusted allowable emissions (§607.C.3):	27.36	27.36
Baseline emissions (§607.C.4):	27.36	27.36
Allowable emissions after reduction (§607.C.5):	0.00	0.00
Surplus emission reduction (§607.C.6):	27.36	27.36
Adjustments for netting (§607.D):	-0	-0
O₃ season ERC:	27.36	27.36

Non-ozone (non-O₃) season NO_x ERC:

	Urea Boiler No.1	Urea Boiler No. 2
Allowable Emissions Before Reduction:	100.71 ¹¹	87.59 ¹²
Actual Emissions:	74.05	70.57
Adjusted allowable emissions (§607.C.3):	100.71	87.59
Baseline emissions (§607.C.4):	74.05	70.57
Allowable emissions after reduction (§607.C.5):	0.00	0.00
Surplus emission reduction (§607.C.6):	74.05	70.57
Adjustments for netting (§607.D):	-0	-0
Non-O₃ season ERC:	74.05	70.57

Analysis of validity

Timeliness

Per §615.A, all applications for banking emission reductions shall be submitted by March 31 following the year in which the reductions occurred. The Urea Plant Boiler No.1 and Boiler No. 2 were shut down on

⁹ 173.4 * 153/365

¹⁰ 150.8 * 153/365

¹¹ 173.4 * 212/365

¹² 150.8 * 212/365

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

DONALDSONVILLE PLANT TERRA MISSISSIPPI NITROGEN, INC DONALDSONVILLE, ASCENSION PARISH, LOUISIANA AI NO. 2245, ACTIVITY NO. 20050012

December 24, 2004. The application was dated March 24, 2005.¹³

Emissions reductions can be recognized as ERC only if they are determined to be surplus, permanent, quantifiable, and enforceable. Each criterion is addressed below.

Surplus

Procedures for calculating the surplus emission reduction are outlined in §607.C & D.

1. The design value for the nonattainment area is below the 1-hour national ambient air quality standard (NAAQS) for ozone. Per §607.C.4.ii, if the design value for the nonattainment area is not above the 1-hour national ambient air quality standard (NAAQS) for ozone, the department shall compare the actual emissions with the adjusted allowable emissions in order to determine baseline emissions.
2. Calculate actual emissions during the baseline period. Actual emissions during the baseline period of 2001 and 2002 claimed in the Terra Urea Plant ERC Bank application were checked against the department's Emission Inventory database. NO_x emissions during the baseline period were calculated to be 127.5 TPY for Boiler No. 1 (53.45 tons-O₃ season + 74.05 tons-non O₃ season) and 121.5 TPY for Boiler No. 2 (50.93 tons-O₃ season + 70.57 tons-non O₃ season).
3. Calculate adjusted allowable emissions. Allowable emissions shall be adjusted to account for all new or revised federal or state regulations adopted that will require, or would have required, all or a portion of the emission reductions that comprise the ERC application. At the time of shutdown of Urea Boilers 1 and 2, the plant was operating under Permit No. 0180-00009-V0 issued January 11, 2001. This permit was also in effect during the baseline period of 2001-2002. The permit had no requirements for emissions of NO_x that were applicable to the urea steam boilers. In addition, the boilers, which were constructed prior to 1984 and had not since been modified or reconstructed, were not subject to any federal New Source Performance Standard (NSPS). The department examined the federal regulations and found no new or modified requirements that would now be applicable to Boilers 1 and 2.

With regard to state regulations, there were no NO_x regulations applicable to natural gas-fired boilers at the time of the reduction. However, LAC 33:III.Chapter 22 was promulgated on March 20, 2002, and had an effective date of May 1, 2005. §2201.D.1 sets NO_x emissions limits for stationary gas turbines and industrial boilers. Boilers 1 and 2 were shut down in 2004, and Terra would have had to install low NO_x burners or other controls to meet the new NO_x RACT regulations by the May 1, 2005 compliance date. Therefore, allowable NO_x emissions during the 5-month ozone season have to be adjusted for compliance with the LAC 33:III.Chapter 22 standard of 0.10 pounds NO_x/MM Btu for industrial boilers with a rated heat input ≥ 80 MM Btu/hr. The heat input of 149 MM Btu/hr for each boiler during the 2001 and 2002 ozone seasons was multiplied by the factor of 0.10 lb/MM Btu to calculate what would have been allowed during the ozone season beyond May 1, 2005. Adjusted allowable ozone season NO_x emissions for each boiler equal 27.36 tons. For non-ozone season, since there are no new or revised NO_x regulations adopted since the baseline period that affect Boilers 1 and 2, adjusted allowable emissions for this period equal permitted values. Total adjusted allowable NO_x emissions for the baseline period are calculated to be 128.07 TPY for Boiler No. 1 (27.36 tons-O₃ season + 100.71 tons-non O₃ season) and

¹³ See EDMS Document No. 32756610.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

DONALDSONVILLE PLANT TERRA MISSISSIPPI NITROGEN, INC DONALDSONVILLE, ASCENSION PARISH, LOUISIANA AI NO. 2245, ACTIVITY NO. 20050012

114.95 TPY for Boiler No. 2 (27.36 tons-O₃ season + 87.59 tons-non O₃ season).

4. Quantify baseline emissions. Per §607.C.4.a.ii, if the design value is not above the NAAQS for ozone, baseline emissions shall be the lower of actual emissions (step 2 above) or adjusted allowable emissions determined in accordance with §607.C.3 (step 3 above). In this case, adjusted allowable emissions are the limiting factors for ozone season and actual emissions are the limiting factors for non-ozone season for each boiler. Baseline emissions for Boiler No. 1 total 101.41 TPY (27.36 tons-O₃ season + 74.05 tons-non O₃ season). Baseline emissions for Boiler No. 2 total 97.93 TPY (27.36 tons-O₃ season + 70.57 tons-non O₃ season).
5. Calculate allowable emissions after the reductions occurred. The Urea Plant, including the steam boilers, was permanently shut down; thus, allowable emissions are zero.
6. Calculate the surplus emission reduction by subtracting the allowable emissions after the reduction occurred from the baseline emissions.

Boiler No. 1: 101.41 TPY - 0.00 TPY = 101.41 TPY (27.36 O₃ season + 74.05 non-O₃ season)

Boiler No. 2: 97.93 TPY - 0.00 TPY = 97.93 TPY (27.36 O₃ season + 70.57 non-O₃ season)

7. Finally, adjust for netting (§607.D). Emission reductions used in a netting analysis (i.e., to determine the *net emissions increase* as defined in LAC 33:III.504 or 509, as appropriate) that prevented the increase from being considered "significant" are not eligible for use as offsets. The quantity of emission reductions utilized to "net out" shall not be considered creditable. There is zero adjustment for netting, as the emission reductions were not used in a netting analysis.

Boiler No. 1: 101.41 TPY - 0.00 TPY = 101.41 TPY (27.36 O₃ season + 74.05 non-O₃ season)

Boiler No. 2: 97.93 TPY - 0.00 TPY = 97.93 TPY (27.36 O₃ season + 70.57 non-O₃ season)

Permanent

The reductions are permanent because the sources Urea Boiler No. 1 and Urea Boiler No. 2 were shut down in December 2004, and then deleted as emission sources from the Donaldsonville Plant Title V Permit No. 0180-00009-V1 issued June 6, 2009.

Quantifiable

The emissions from the plant were calculated using approved EPA methods, EPA emission factors, factors developed through stack tests performed in accordance with approved EPA methods, process data, and production data.

Enforceable

Finally, the reductions are enforceable via Permit No. 0180-00009-V1 issued June 6, 2009, in which the emission sources Urea Boiler No. 1 (Emission Point No. ID-30) and Urea Boiler No. 2 (Emission Point No. ID-32) were deleted from the Donaldsonville facility permit. Further operation of these sources would constitute operation without a permit in violation of Louisiana environmental regulations and the Louisiana Environmental Quality Act.



Terra Industries Inc.
600 Fourth Street
P.O. Box 6000
Sioux City, IA 51102-6000
Telephone: (712) 277-1340

MAIN FILEoriginal to TOPcopy to adm folder

March 24, 2005

Mr. Keith Jordon
Louisiana Department of Environmental Quality
Office of Environmental Services
P.O. Box 4313
Baton Rouge, LA 70821-4313

Re: Emission Reduction Credit Application
Amendment to Previous ERC Application submitted Feb. 21, 2005
Agency Interest # 2245
Permit No. 0180-00009-VO
Former Triad Nitrogen, LLC Facility - Donaldsonville, Louisiana

Dear Mr. Jordon:

As you discussed with Mr. Jim Schellhorn of Terra Industries and Mr. Ken Faulkner of FC&E Engineering during the March 16, 2005 meeting, attached is an amended Emissions Reduction Credit Application submitted for the Donaldsonville facility. As stated in our letter to your office dated February 21, 2005, Terra's plans at this time for the Donaldsonville facility do not involve operation of the two ammonia plants or the urea manufacturing plant. As such, most of the sources at these plants that emit NOx or VOC emissions will be shutdown permanently. Therefore, the attached application includes the affected emission points and denotes the ERCs requested for each emission point. Since the Donaldsonville facility is located in Ascension Parish which is in the Baton Rouge Nonattainment Area, the facility is subject to LAC 33:III.Chapter 22. Consequently, Terra has calculated the emission credits for both the ozone season and the non-ozone season. In summary, Terra is requesting to bank the following emission reductions:

Total NOx Credits: 2,159.91 tons
Ozone Season: 383.79 tons
Non-Ozone Season: 1,776.12 tons

Total VOC Credits: 76.81 tons
Ozone Season: 12.95 tons
Non-Ozone Season: 63.86 tons

The attached application for emission credits is specific to air permit #0180-00009-VO. Should you have any questions, please contact Jim Schellhorn, Terra's Director of EH&S at (918) 266-9653, or Ken Faulkner or FC&E Engineering, LLC at (601) 259-5217.

Sincerely,

Richard Sanders, Jr.
Vice President, Manufacturing

attachment

2005 MAR 28 PM 2:53
DEQ - CES

Department of Environmental Quality Office of
Air Quality and
Radiation Protection
P.O. Box 82135
Baton Rouge, LA 70884-2135
(504) 765-0195

LOUISIANA

ERC BANK APPLICATION

VOLATILE ORGANIC COMPOUNDS



COMPANY: Terra Mississippi Nitrogen, Inc. (AI#2245) Amendment to
February 21, 2005 ERC Application submittal to LDEQ

LOCATION: Donaldsonville Ascension
(City) (Parish)

39041 Hwy 18 West, Donaldsonville, LA 70346
(Physical Location)

MAILING ADDRESS: P.O. Box 310 Donaldsonville, LA 70346
(Street or P.O. Box) (City) (State) (Zip Code)

2,159.91 TPY (NOx Credits)

76.81 TPY (VOC Credits)
(ERCs deposited-TPY)

N/A

(ERCs relied upon for netting-TPY)

N/A

(ERCs relied upon for offsets-TPY)

12/24/04

(Date of Emissions Increase/Decrease)

2,159.91 TPY (NOx Credits)

76.81 TPY (VOC Credits)
(ERCs available for netting-TPY)

2,159.91 TPY (NOx Credits)

76.81 TPY (VOC Credits)
(ERCs available for offsets-TPY)

COMMENTS

Terra Mississippi Nitrogen, Inc. (TMNI), an indirect wholly owned subsidiary of Terra Industries, Inc., purchased the Donaldsonville facility on Dec. 21, 2004 from Mississippi Chemical Corporation. As a part of Terra's plan for the facility, the two ammonia plants and the urea plant will be permanently shutdown. Terra would like to bank the NOx and VOC emission reduction credits for either future use or sale by the company.

AFFECTED PERMIT

Permit Number: 0180-00009-VO **Facility:** Formerly Triad Nitrogen, LLC
Donaldsonville Facility

Affected EIQ Source ID No.(s): Emission Points ID-02, ID-04, ID-06, ID-08,
ID-12, ID-30, ID-32, ID-50

I hereby certify that the information contained in this ERC Bank Application and calculations is true and accurate to the best of my knowledge.

Richard Sanders, Jr. Vice-President, Manufacturing
(Name) (Title)

(712) 277-1340
(Telephone Number)

Richard Sanders, Jr.
(Signature)

3/24/05
(Date)

1006 APR 20 11 2:53

Emission Reduction Credit Summary Table

NOx Emissions Summary - A1 & Urea

Facility Identification

Name: Terra Mississippi Nitrogen, Inc.
Former Triad Nitrogen, LLC - Ammonia Plant #1 (A1 Plant) & Urea Plant

Location: 39041 Hwy 18 West
Donaldsonville, LA 70346

Designation (Identification) Number: AI 2245 - Air Permit # 0180-00009-VO

Affected Units	A1 - Ammonia Reformer	Urea Boilers #1 & #2
Emission Point Nos.	ID-06	ID-30 & ID-32
Unit Size (MMBtu/hr)	824.33	149.00 each
Curtailed/Permanently Shutdown (CURTL/PShtDwn)	Yes (PShtDwn)	Yes (PShtDwn)
Total Future NOx Emissions (TPY)	0.00	0.00
* 2001 NOx Emissions (TPY)	987.00	279.00
* 2002 NOx Emissions (TPY)	1416.11	229.00
Two Year Average (TPY) / (lb/hr)	1201.56/274.32	254/57.99
** Ozone Season (Tons) / (lb/hr)	208.46/113.54	68.35/37.23
** Non-Ozone Season (Tons) / (lb/hr)	993.10/390.33	185.65/72.98
RACT Rate Limit (lb/MMBtu)	0.23	0.1
Allowable Emissions Ozone Season (Tons) / (lb/hr)	348.10/189.60	54.71/29.80
Ozone Season Banked NOx Emissions (Tons)	208.46	54.71
Allowable Emission Rate Non-Ozone Season (Tons) / (lb/hr)	1078.23/424.50	269.75/106.20
Non-Ozone Season Banked Nox Emissions (Tons)	993.1	185.65
Total Banked Emissions (TPY)	1201.56	240.36

* Emissions were taken from the 2001/2002 EIS reports.

** Emissions were calculated from the total fuel used during the Ozone Season.

Emission Reduction Credit Summary Table

NOx Emissions Summary - A2 Plant

Facility Identification

Name: Terra Mississippi Nitrogen, Inc.
Former Triad Nitrogen, LLC - Ammonia Plant: #2 (A2 Plant) _

Location: 39041 Hwy 18 West
Donaldsonville, LA 70346

Designation (Identification) Number: AI 2245 - Air Permit # 0180-00009-VO

Affected Units	A2 - Ammonia Reformer
Emission Point Nos.	ID-02
Unit Size (MMBtu/hr)	818.00
Curtailed/Permanently Shutdown (CURTL/PShtDwn)	Yes (PShtDwn)
Total Future NOx Emissions (TPY)	0.00
* 2001 NOx Emissions (TPY)	703.98
* 2002 NOx Emissions (TPY)	732.00
Two Year Average (TPY) / (lb/hr)	717.99 / 323.03
** Ozone Season (Tons) / (lb/hr)	120.62 / 358.99
** Non-Ozone Season (Tons) / (lb/hr)	597.37 / 316.63
RACT Rate Limit (lb/MMBtu)	0.23
Allowable Emissions Ozone Season (Tons) / (lb/hr)	345.42 / 188.14
Ozone Season Banked NOx Emissions (Tons)	120.62
Allowable Emission Rate Non-Ozone Season (Tons) / (lb/hr)	820.00 / 320.81
Non-Ozone Season Banked Nox Emissions (Tons)	597.37
Total Banked Emissions (TPY)	717.99

* Emissions were taken from the 2001/2002 EIS reports.

** Emissions were calculated from the total fuel used during the Ozone Season.

Emission Reduction Credit Summary Table VOC Emissions Summary - A1, A2, & Urea Plants

Facility Identification

Name: Terra Mississippi Nitrogen, Inc.

Former Triad Nitrogen, LLC - Ammonia Plant #1 (A1 Plant), Ammonia Plant #2 (A2 Plant) & Urea Plant

Location: 39041 Hwy 18 West

Donaldsonville, LA 70346

Designation (Identification) Number: AI 2245 - Air Permit # 0180-00009-VO

Affected Units Emission Point Nos.	A2 - Ammonia Reformer ID-02	A2 CO2 Regenerator ID-04	A1 - Ammonia Reformer ID-06	A1 Steam Condensate Stripper ID-08	A1 CO2 Regenerator ID-12	Urea Boilers #1 & #2 ID-30 & ID-32	Formaldehyde Tank ID-50
Unit Size (Capacity as specified) Curtailment/Permanently Shutdown (CURTL/PShtDwn)	818 MMBtu/hr Yes (PShtDwn)	1,800 tons/day Yes (PShtDwn)	824.33 MMBtu/hr Yes (PShtDwn)	1,376.6 tons/day Yes (PShtDwn)	1,376.6 tons/day Yes (PShtDwn)	149.00 MMBtu/hr each Yes (PShtDwn)	26,128 gals Yes (PShtDwn)
Total Future VOC Emissions (TPY)	0.00	0.00	0.00	0.00	0.00	0.00	0.00
* 2001 VOC Emissions (TPY)	2.63	19.85	4.00	11.00	36.00	2.00	0.01
* 2001 Methanol Emissions (TPY)	0.00	19.85	0.00	11.00	36.00	0.00	0.00
* 2001 Formaldehyde Emissions (TPY)	0.00	0.00	0.00	0.00	0.00	0.00	0.01
* 2002 VOC Emissions (TPY)	3.00	23.00	5.00	12.66	29.00	6.00	0.01
* 2002 Methanol Emissions (TPY)	0.00	23.00	0.00	12.66	29.00	0.00	0.00
* 2002 Formaldehyde Emissions (TPY)	0.00	0.00	0.00	0.00	0.00	0.00	0.01
Two Year Average (TPY) / (lb/hr)	2.815 / 1.267	21.425 / 9.639	4.500 / 1.027	11.830 / 2.701	32.500 / 7.420	4.000 / 0.913	0.010 / 0.002
** Ozone Season (Tons) / (lb/hr)	0.473 / 1.408	3.599 / 10.711	0.756 / 0.412	1.987 / 1.082	5.480 / 2.974	0.672 / 0.366	0.002 / 0.0003
** Non-Ozone Season (Tons) / (lb/hr)	2.342 / 1.241	17.828 / 9.449	3.473 / 1.365	9.843 / 3.869	27.040 / 10.629	3.328 / 1.308	0.008 / 0.0017
RACT Rate Limit (lb/MMBtu)	N/A for VOCs	N/A for VOCs	N/A for VOCs	N/A for VOCs	N/A for VOCs	N/A for VOCs	N/A for VOCs
Allowable Emissions Ozone Season (Tons) / (lb/hr)	2.196 / 1.440	20.896 / 12.410	2.600 / 1.720	7.329 / 4.23	21.283 / 24.000	3.141 / 2.060	0.004 / 0.002
Ozone Season Banked VOC Emissions (Tons)	0.473	3.599	0.756	1.987	5.48	0.672	0.002
Allowable Emission Rate Non-Ozone Season (Tons) / (lb/hr)	3.074 / 1.440	29.254 / 12.410	3.64 / 1.720	10.281 / 4.23	29.797 / 24.000	4.398 / 2.060	0.006 / 0.002
Non-Ozone Season Banked VOC Emissions (Tons)	2.342	17.828	3.473	9.843	27.04	3.328	0.008
SubTotal Banked Emissions (TPY)	2.615	21.425	4.229	11.830	32.500	4.000	0.010
Total Banked VOC Emissions (TPY)				76.81			

* Emissions were taken from the 2001/2002 EIS reports. VOC emissions are the total of the specified compounds listed. In the case where no available data could provide specified organic compounds (such as with fuel burning sources), the VOC emissions were simply totaled.

** Emissions were calculated from the total fuel used or the Ammonia Produced during the Ozone Season.

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
DSM COPOLYMER, ADDIS PLANT, AI 2519
PROPOSED NO_x and VOC EMISSION REDUCTION CREDITS (ERC)

DSM Copolymer, 9263 Highway 1 South in Addis, West Baton Rouge Parish, LA 70710, Air Permit Number 3120-00004-V0, proposes to add emission reductions credits (ERC) of NO_x and VOC to the LDEQ Emission Reductions Credits Banking System. This action is due to the permanent shutdown of Boiler No. 1 at the Addis Plant, a synthetic rubber manufacturing plant, on October 11, 2003.

The total estimated emission reductions, in tons per year (TPY) are as follows:

	NO_x	VOC
Allowable emissions before reduction:	70.00	2.90
Actual emissions (2001/2002 average) (§607.C.2):	49.50	2.00
Adjusted allowable emissions (§607.C.3):	62.51	2.90
Baseline emissions (§607.C.4):	49.50	2.00
Allowable emissions after reduction (§607.C.5):	0.00	0.00
Surplus emission reduction (§607.C.6):	49.50	2.00
Adjustments for netting (§607.D):	-0	-0
Total ERC*:	49.50	2.00
Ozone Season ERC	20.75	
Non-ozone Season ERC	28.75	

* Total ERC = ozone season ERC + non-ozone season ERC.

The Department is hereby providing notice of its determination that the reductions are surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6 as of the date of this notice.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this proposed emissions reduction may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, April 19, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The ERC application, draft certificates, and Analysis of Validity of Emission Reductions as ERC are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the West Baton Rouge Parish Library-Headquarters, 830 N. Alexander Avenue, Port Allen, LA 70767.

Inquiries or requests for additional information regarding this permit action should be directed to John H. Dyer, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3005.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft certificate, and Analysis of Validity of Emission can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 2519, Permit Number 3120-00004-03, and Activity Number PER20040001.

Scheduled publication date: Thursday, March 18, 2010

BOBBY JINDAL
GOVERNOR



PEGGY M. HATCH
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest (AI) No.: 2519
Activity No.: PER20040001

Lloyd J. Tabary II
Corporate Representative
DSM Copolymer
8560 Anselmo Lane
Baton Rouge, LA 70810

RE: NO_x and VOC Emission Reduction Credits, Addis Plant, DSM Copolymer, Addis, West
Baton Rouge Parish, Louisiana

Dear Mr. Tabary:

Please find enclosed your Emission Reduction Credit (ERC) Certificates to reflect the creditable NO_x and VOC reductions realized by permanently shutting down Boiler No. 1 (EIQ No. 45-83) at the Addis Plant.

A notice requesting public comment on the ERC Certificates was published in both *The Advocate* and the *West Side Journal* on March xx, 2010. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on March xx, 2010. XX comments were received.

If you have any questions, please call John H. Dyer of the Air Permits Division at (225) 219-3005.

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

Date

CSN:JHD

FOR
Public
Notice
only



Louisiana Department of Environmental Quality Emission Reduction Credit Certificate

Item Number: 2519PER20040001

Owner: DSM Copolymer

Phone number: (225) 490-0021

Company Address: 8560 Anselmo Lane
Baton Rouge, Louisiana 70810

EMISSION REDUCTION INFORMATION

Physical

Location: 9263 Highway 1 S, Addis 70710, West Baton Rouge Parish

Method of ERC creation: Permanent Shutdown of Boiler No. 1 (EIQ No. 45-83) at the Addis Plant
(Activity Number PER20040001)

Pollutant: NO_x (tons)

O ₃ NO _x Generated	20.75
Non O ₃ NO _x Generated	<u>28.75</u>
TOTAL NO _x Generated	49.50

Date of emission reduction: October 11, 2003

Permit Number: 3120-00004-03

Assistant Secretary

Date



Louisiana Department of Environmental Quality Emission Reduction Credit Certificate

Item Number: 2519PER20040001
 Owner: DSM Copolymer
 Phone number: (225) 490-0021
 Company Address: 8560 Anselmo Lane
 Baton Rouge, Louisiana 70810

EMISSION REDUCTION INFORMATION

Physical

Location: 9263 Highway 1 S, Addis 70710, West Baton Rouge Parish

Method of ERC creation: Permanent Shutdown of Boiler No. 1 (EIQ No. 45-83) at the Addis Plant
 (Activity Number PER20040001)

Pollutant: VOC (tons)

Amount Generated 2.00

Date of emission reduction: October 11, 2003

Permit Number: 3120-00004-03

 Assistant Secretary

 Date

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT DSM COPOLYMER ADDIS, WEST BATON ROUGE PARISH, LOUISIANA AI NO. 2519 ACTIVITY NO. PER20040001

Background

DSM Copolymer operated a synthetic rubber manufacturing plant located one mile south of Addis in West Baton Rouge Parish, Louisiana. The Addis Plant produced both solid and liquid polymers. Boiler No. 1 (EIQ No. 45-83) was one of three boilers that generated process steam for the Addis Plant. Boiler No. 1 was shut down on October 11, 2003. Boiler No. 1 was operating under Permit 3120-00004-03, issued July 10, 1997, when it ceased operation. Subsequently, the entire plant was shut down in January 2005 and dismantled.

Boiler No. 1 was a natural gas-fired steam boiler with a maximum rating of 119 MM BTU/hr. The boiler was constructed prior to 1984 and was not subject to any federal or state regulations for emissions of the air pollutants NO_x and VOC.

The shutdown of Boiler No.1 resulted in reductions of both NO_x and VOC.

Summary

A portion of the resultant NO_x and VOC emission decrease associated with shutdown of Boiler No. 1 is surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6-Regulations on Control of Emissions Through the Use of Emission Reduction Credits Banking. Accordingly, these reductions qualify as Emissions Reduction Credits (ERC). Amounts in the following table are given in tons per year (TPY).

Total NO_x ERC:

<u>Source</u>	<u>Allowable Emissions Before Reduction¹</u>	<u>Actual Emissions²</u>	
Boiler No. 1	70.00	49.50	49.50
	Adjusted allowable emissions (§607.C.3):		62.51
	Baseline emissions (§607.C.4):		49.50 ³
	Allowable emissions after reduction (§607.C.5):		0.00
	Surplus emission reduction (§607.C.6):		49.50
	Adjustments for netting (§607.D):		-0
	Total ERC:		49.50

¹ Permit 3120-00004-03 issued 7/10/97.

² Average of 2001 and 2002 actual emissions (§607.C.2).

³ Baseline emissions shall be the lower of actual emissions or adjusted allowable emissions when the design value is not above the NAAQS for ozone (§607.C.4.a.ii).

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT DSM COPOLYMER ADDIS, WEST BATON ROUGE PARISH, LOUISIANA AI NO. 2519 ACTIVITY NO. PER20040001

Louisiana promulgated a NO_x Reasonably Available Control Technology (RACT) rule (LAC 33:III.Chapter 22) on March 20, 2002. Beginning May 1, 2005, Chapter 22 required sources to reduce NO_x emissions during the five month ozone season, May 1 through September 30, inclusively. Typically, a stationary source reduces emissions below the baseline to generate surplus emission reduction credits. Due to the five month applicability of Chapter 22, the allowable emission limitation for a stationary source could potentially have two values, one for the five month ozone season, and another for the seven-month non-ozone season.

Thus, baseline emissions for a given stationary source, which are used to determine the surplus emission reduction (§607.C.6), could have two different values. In order to accurately determine the amount of ERC that can be used as offsets for nonattainment new source review (NNSR) permitting, baseline emissions and surplus ERC must be determined for the two time periods. Total NO_x ERC for any annual time period will consist of the ERC from the five month ozone season and the ERC from the seven month non-ozone season. Offset requirements for new sources derive from Section 173(a)(1)(A) of the Clean Air Act (CAA), which concerns "total" emissions and does not address the use of emission offsets for nonattainment permitting over periods of less than one year. Therefore, the NO_x ERC to be used in all NNSR permitting under LAC 33:III.504 must be determined by adding the ERC from the ozone season and the non-ozone season.

With respect to all offsets under Chapter 5 and all ERC under Chapter 6, the total NO_x emission increases during the ozone season must be offset by NO_x ERC from the ozone season. Non-ozone season NO_x increases may be met by either ozone or non-ozone NO_x ERC. The annual NO_x increase must be offset by the total combination of ozone and non-ozone season surplus NO_x emission reduction credits. See 67 FR 48093-48094 (July 23, 2002).

Ozone (O₃) season NO_x ERC:

<u>Source</u>	<u>Allowable Emissions Before Reduction</u>	<u>Actual Emissions</u>	
Boiler No. 1	29.34 ⁴	20.75	20.75
	Adjusted allowable emissions (§607.C.3):		21.85
	Baseline emissions (§607.C.4):		20.75
	Allowable emissions after reduction (§607.C.5):		0.00
	Surplus emission reduction (§607.C.6):		20.75
	Adjustments for netting (§607.D):		-0
	O₃ season ERC:		20.75

⁴ 70.00 * 153/365

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT DSM COPOLYMER ADDIS, WEST BATON ROUGE PARISH, LOUISIANA AI NO. 2519 ACTIVITY NO. PER20040001

Non-ozone (non-O₃) season NO_x ERC:

<u>Source</u>	<u>Allowable Emissions Before Reduction</u>	<u>Actual Emissions</u>	
Boiler No. 1	40.66 ⁵	28.75	28.75
	Adjusted allowable emissions (§607.C.3):	40.66	
	Baseline emissions (§607.C.4):	28.75	
	Allowable emissions after reduction (§607.C.5):	0.00	
	Surplus emission reduction (§607.C.6):	28.75	
	Adjustments for netting (§607.D):	-0	
	Non-O₃ season ERC:	28.75	

Total VOC ERC:

<u>Source</u>	<u>Allowable Emissions Before Reduction⁶</u>	<u>Actual Emissions⁷</u>	
Boiler No. 1	2.90	2.00	2.00
	Adjusted allowable emissions (§607.C.3):	2.90	
	Baseline emissions (§607.C.4):	2.00	
	Allowable emissions after reduction (§607.C.5):	0.00	
	Surplus emission reduction (§607.C.6):	2.00	
	Adjustments for netting (§607.D):	-0	
	Total ERC:	2.00	

Analysis of validity

Timeliness

Per §615.A, all applications for banking emission reductions shall be submitted by March 31 following the year in which the reductions occurred. Boiler No.1 was shut down on October 11, 2003. The application was dated March 31, 2004.⁸

Emissions reductions can be recognized as ERC only if they are determined to be surplus, permanent, quantifiable, and enforceable. Each criterion is addressed below.

⁵ 70.00 * 212/365.

⁶ Permit 3120-00004-03 issued 7/10/97.

⁷ Average of 2001 and 2002 actual emissions (§607.C.2).

⁸ See EDMS Document No. 31455504.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT DSM COPOLYMER ADDIS, WEST BATON ROUGE PARISH, LOUISIANA AI NO. 2519 ACTIVITY NO. PER20040001

Surplus

Procedures for calculating the surplus emission reduction are outlined in §607.C & D.

1. The design value for the nonattainment area is below the 1-hour national ambient air quality standard (NAAQS) for ozone. Per §607.C.4.ii, if the design value for the nonattainment area is not above the 1-hour national ambient air quality standard (NAAQS) for ozone, the department shall compare the actual emissions with the adjusted allowable emissions in order to determine baseline emissions.
2. Calculate actual emissions during the baseline period. Actual emissions during the baseline period of 2001 and 2002 claimed in the Addis Plant Boiler No. 1 ERC Bank application were checked against the department's Emission Inventory database. NO_x and VOC emissions during the baseline period were calculated to be 49.50 and 2.00 TPY, respectively.
3. Calculate adjusted allowable emissions. Allowable emissions shall be adjusted to account for all new or revised federal or state regulations adopted that will require, or would have required, all or a portion of the emission reductions that comprise the ERC application. At the time of shutdown of Boiler No. 1, the DSM Copolymer Addis plant was operating under Permit No. 3120-00004-03 issued July 10, 1997. This permit was also in effect during the baseline period of 2001-2002. The permit required the plant to comply with the emission control regulations of 40 CFR 63, Subpart U, NESHAP: Group I Polymers and Resins. However, there are no Subpart U requirements applicable to Boiler No. 1. In addition, the boiler, which was constructed prior to 1984 and had not since been modified or reconstructed, was not subject to any federal New Source Performance Standard (NSPS). The department examined the federal regulations and found no new or modified requirements that would now be applicable to Boiler No.1.

With regard to state regulations, there were no NO_x and VOC regulations applicable to a natural gas-fired boiler at the time of the reduction. However, LAC 33:III.Chapter 22 was promulgated on March 20, 2002, and had an effective date of May 1, 2005. §2201.D.1 sets NO_x emissions limits for stationary gas turbines and industrial boilers. Boiler No. 1 was shut down in 2003, and DSM would have had to install low NO_x burners or other controls to meet the new NO_x RACT regulations by the May 1, 2005 compliance date. Therefore, allowable NO_x emissions during the 5-month ozone season have to be adjusted for compliance with the LAC 33:III.Chapter 22 standard of 0.10 pounds NO_x/MM Btu for industrial boilers ≥ 80 MM Btu/hr. The heat input of 119 MM Btu/hr during the 2001 and 2002 ozone seasons was multiplied by the factor of 0.10 lb/MM Btu to calculate what would have been allowed beyond May 1, 2005. Adjusted allowable NO_x emissions equal 21.85 tons for ozone season. For non-ozone season, since there are no new or revised NO_x regulations adopted since the baseline period that would have affected Boiler 1, adjusted allowable emissions for this period equal the permitted value. Total adjusted allowable NO_x emissions for the baseline period are calculated to be 62.51 TPY (21.85 tons-O₃ season + 40.66 tons-non O₃ season).

For VOC emissions, there are no new or revised federal or state regulations adopted since the baseline period that would have affected Boiler No. 1. Therefore, the emission limits contained in Permit No. 3120-00004-03 in effect at the time of the reduction also represent the "adjusted allowable emissions" as defined by §607.C.3. Adjusted allowable VOC emissions total 2.90 TPY.

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT DSM COPOLYMER ADDIS, WEST BATON ROUGE PARISH, LOUISIANA AI NO. 2519 ACTIVITY NO. PER20040001

4. Quantify baseline emissions. Per §607.C.4.a.ii, if the design value is not above the NAAQS for ozone, baseline emissions shall be the lower of actual emissions (step 2 above) or adjusted allowable emissions determined in accordance with §607.C.3 (step 3 above). In this case, actual emissions are the limiting factors. Baseline emissions of NO_x and VOC total 49.50 TPY and 2.00 TPY, respectively.
5. Calculate allowable emissions after the reductions occurred. Boiler No. 1 was permanently shut down; thus, allowable emissions after the reduction are zero.
6. Calculate the surplus emission reduction by subtracting the allowable emissions after the reduction occurred from the baseline emissions.

$$\text{NO}_x: 49.50 \text{ TPY} - 0.00 \text{ TPY} = 49.50 \text{ TPY}$$

$$\text{VOC: } 2.00 \text{ TPY} - 0.00 \text{ TPY} = 2.00 \text{ TPY}$$
7. Finally, adjust for netting (§607.D). Emission reductions used in a netting analysis (i.e., to determine the *net emissions increase* as defined in LAC 33:III.504 or 509, as appropriate) that prevented the increase from being considered "significant" are not eligible for use as offsets. The quantity of emission reductions utilized to "net out" shall not be considered creditable. There is zero adjustment for netting, as the emission reductions were not used in a netting analysis.

$$\text{NO}_x: 49.50 \text{ TPY} - 0.00 \text{ TPY} = 49.50 \text{ TPY}$$

$$\text{VOC: } 2.00 \text{ TPY} - 0.00 \text{ TPY} = 2.00 \text{ TPY}$$

Permanent

The reductions are permanent because Boiler No. 1 was shut down on October 11, 2003, and subsequently demolished when the entire plant was shut down in January 2005. The plant wide air emissions permit was terminated on October 10, 2006.

Quantifiable

The emissions from Boiler No. 1 were calculated using approved EPA methods, EPA emission factors, and process data.

Enforceable

Finally, the reductions are enforceable because the Boiler No. 1 emission source was permanently shut down and removed from the site. The entire plant then ceased operation and the Addis plant-wide permit was terminated by the department.

DSM Copolymer

P. O. Box 327
Addis, LA 70710-0327

Bart Wesley
Quality, Environmental, Safety & Health Manager
Phone: (225)-267-3161
Facsimile: (225)-267-3832
E-Mail: bart.wesley@dsm.com

original to FOA

copy to BW Petros/Guyton/Dyer

DSM 

PER20040001

MAIN FILE

March 31, 2004

CERTIFIED MAIL: RETURN RECEIPT REQUESTED
CERTIFIED MAIL NUMBER: 7003 1010 0005 2126 4592

Office of Environmental Services
Permits Division
P. O. Box 82135
Baton Rouge, LA 70884-2135

DSM Copolymer
Louisiana ERC Bank Application
Agency Interest No. 2519
Permit No 0591 30831

Dear Sirs:

Please find enclosed DSM Copolymer's Louisiana ERC Bank Application.

If you have any questions or need any further information about this material, please contact me at (225) 267-3161.

Sincerely,


Bartley D. Wesley
QESH Manager

Enclosures: LA ERC Bank Application
BDW-23-04

2004 APR 13 PM 3:49

DEQ - OES

Department of Environmental Quality
Office of Environmental Services
Permits Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
(225) 765-0219

LOUISIANA

ERC BANK APPLICATION

NO_x _X_ OR VOC _X_



COMPANY: DSM Copolymer 2519
(Agency Interest No.)

FACILITY: Addis Facility 059130831
(Permit No.)

LOCATION: Addis West Baton Rouge
(City) (Parish)

9263 Louisiana Highway 1 South
(Physical Location)

CONTACT: Lloyd Tabery General Counsel (225) 267-3466
(Name) (Title) (Phone)

MAILING ADDRESS: 9263 La. Hwy. 1
(Street or P.O. Box)

South Addis LA 70710
(City) (State) (Zip Code)

45-83 October 11, 2003 May 2001 - April 2002
(Affected EIQ Source ID(s)) (Date of Actual Emissions Decrease) (Baseline Period)

	NO _x		VOC
ALLOWABLES BEFORE:	<u>29.34</u> (May 1 - September 30)	<u>40.65</u> (October 1 - April 30)	<u>2.9</u> (TPY)
AVG. ACTUAL EMISSIONS:	<u>29.34</u> (May 1 - September 30)	<u>40.65</u> (October 1 - April 30)	<u>2.9</u> (TPY)
CHAPTER 22 LIMIT ¹ :	<u>26.90</u> (May 1 - September 30)	<u>N/A</u> (October 1 - April 30)	<u>N/A</u>
ALLOWABLES AFTER ² :	<u>0</u> (May 1 - September 30)	<u>0</u> (October 1 - April 30)	<u>0</u> (TPY)
CREDITABLE CHANGE:	<u>26.90</u> (May 1 - September 30)	<u>40.65</u> (October 1 - April 30)	<u>2.9</u> (TPY)

¹ This data may be omitted if Chapter 22 limits have already been incorporated into the source's permit.

² Allowables should account for all applicable federal and state regulations, emissions limitations, and compliance orders, consent decrees, etc. In the case of enforcement instruments, surplus reductions may be included as per the terms of the order or agreement. If no such terms are included, then the reductions are not surplus.

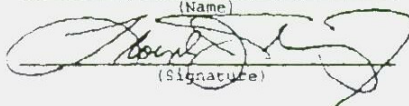
CREDIBILITY:

All applicable state and federal regulations that apply to the affected emission point(s) should be addressed in the cover letter to this document.

RESPONSIBLE OFFICIAL CERTIFICATION:

I hereby certify that the information contained in this ERC Bank Application and attached calculations is true and accurate to the best of my knowledge.

Lloyd Tabery General Counsel (225) 267-3466
(Name) (Title) (Phone)

 MARCH 31, 2004
(Signature) (Date)

April 2002



State of Louisiana
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.
GOVERNOR

J. DALE GIVENS
SECRETARY

Certified Mail No.: P 159 557 954

Mr. Lloyd J. Tabary II, Esq.
Environmental Manager
DSM Copolymer
Post Office Box 2591
Baton Rouge, Louisiana 70821-2591

Dear Mr. Tabary:

RE: Permit modification, Addis Plant, DSM Copolymer, Addis,
West Baton Rouge Parish, Louisiana

This is to inform you that the permit modification for the above referenced facility has been approved under LAC 33:III.501. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

The permit number cited below should be referenced in future correspondence regarding this facility.

Done this 10th day of July, 1997.

Permit No.: 3120-00004-03

Very truly yours,

Gustave A. Von Bodungen
Gustave A. Von Bodungen, P.E.
Assistant Secretary

GVB:DCN

c: Capital Regional Office



recycled paper

OFFICE OF AIR QUALITY

P.O. BOX 82135

BATON ROUGE, LOUISIANA 70854-2135

AN EQUAL OPPORTUNITY EMPLOYER



**AIR PERMIT BRIEFING SHEET
AIR QUALITY DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA**

I. BACKGROUND:

DSM Copolymer operates a synthetic rubber manufacturing plant one mile south of Addis, West Baton Rouge Parish, Louisiana. The original grandfathered plant was authorized to use fuel oil under Permit Number 258, dated December 18, 1973. Permit Number 899, dated February 28, 1978 allows the plant to produce the new TLA liquid polymer. A third finishing line was added to the plant under Permit Number 1742T, dated December 20, 1988. The EPM/EPDM production was allowed to increase to 160 million pounds per year by Permit Number 1742T(M-1). The plant added a fourth finishing line under Permit Number 3120-00004-01, dated October 12, 1990. Currently the plant operates under Permit Number 3120-00004-02, dated October 23, 1992 for the Boiler No. 3 modification.

II. ORIGIN

An air permit application and Emission Inventory Questionnaire (EIQs) dated September 11, 1996, as well as additional information dated March 27, 1997, were received requesting a permit modification.

III. DESCRIPTION

The Addis Plant produces both solid and liquid polymers. Ethylene, propylene, and other comonomers are received via pipelines, blended with solvent, and metered to the reactors where polymerization occurs. The polymerization reaction is then stopped and unreacted monomers are removed. Crumb rubber is dewatered and pressed into bales for shipping. In the liquid polymer process, the polymer/solvent mixture from the reactors is washed and mixed with hot oil. The liquid product is separated from unreacted monomers and pumped to storage. Recovered monomers and solvent from both processes are purified, dried, and recycled to the feed blending section.

DSM Copolymer proposes to increase the production rate of Boiler No. 1 and No. 2 to 82,271 pounds of steam per hour. The additional steam requirement is from the OAl product improvement project. The retrofitting project for the No. 7 and No. 9 Dryers was canceled. Boiler No. 3 (BIF) is excluded from this permit.

**AIR PERMIT BRIEFING SHEET
AIR QUALITY DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA**

Estimated emission changes in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Permit Change</u>	<u>Actual Change</u>
PM ₁₀	17.71	8.85	- 8.86	+ 0.94
SO ₂	1.08	0.67	- 0.41	+ 0.34
NO _x	168.60	147.23	- 21.37	+ 69.48
CO	111.47	36.70	- 74.77	+ 11.62
VOC	543.40	545.27	+ 1.87	+ 4.40
HCl	0.03	0.03	-	-
SO ₃	0.02	0.02	-	-
Ammonia	-	5.25	+ 5.25	-
Chlorine	-	0.22	+ 0.22	-

VOC includes ethylene, propylene, 231.19 TPY of n-hexane and 53.36 TPY of toluene. The actual 69.48 tons/yr of NO_x increase is above the Prevention of Significant Deterioration (PSD) de minimis of 40 TPY. A contemporaneous netting demonstration is required. DSM installed Low NO_x burners in the No. 3 Boiler in December 1992 to reduce 49.0 tons/year of NO_x, which provides enough credit to net out of PSD review.

The Acid Wash Temporary Solvent Storage Tank complies with NSPS Subpart Kb. Fugitive emissions of VOC are controlled by a monitoring program conforming to LAC 33:III.2121. The Addis Plant complies with NESHAP Subpart U.

IV. TYPE OF REVIEW:

This permit was reviewed for compliance with the Louisiana Air Quality Regulations, New Source Performance Standards and NESHAP. Prevention of Significant Deterioration does not apply.

This facility is a major source of toxic air pollutants. Normal hexane and toluene emissions are above the minimum emission rates (MER) under Louisiana Toxic Regulations. Maximum achievable control technology is not required for these Class III toxic air pollutants. Impact on air quality is below the Louisiana toxic ambient air standards. Air toxic compliance plan has been approved.

V. PUBLIC NOTICE:

Public notice is not required for a minor permit modification.

SPECIFIC CONDITIONS.

ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA

1. Permittee shall demonstrate compliance with NO_x and CO emission limits set in this permit by performing a stack test on Boiler No. 1 and No. 2, Emission Point 45-83 and 46-83. Test methods and procedures shall be in accordance with 40 CFR 60, Appendix A, Method 7E-Determination of Nitrogen Oxides Emissions from Stationary Sources and Method 10-Determination of Carbon Monoxide emissions from Stationary Sources.
2. Permittee shall ensure destruction of emissions to the flare stack, Emission Point 32-81, by maintaining the heat content of the flare gas above 300 BTU/scf and by installing, maintaining, and operating according to the manufacturer's specifications a heat sensing device to detect the continuous presence of a flame. Alternate devices may be used with the prior approval of the Air Quality Division, Engineering Section.
3. Permittee shall control particulate emissions from finishing line dryers, Emission Points 34-81, 35-81, 38-82, and 74-90, with wet scrubbers having removal efficiencies of 99% or greater. Minimum scrubber liquid flowrate shall be 375 gpm. This flowrate shall be recorded daily. The records shall be kept on site and available for inspection by the Air Quality Division.
4. Fugitive emissions of VOC shall be controlled by a monitoring program conforming to LAC 33:III.2121.
5. Hexane emissions from the Fourth Finishing Line shall be limited to no more than an average of 0.30 lb/100 lb product. The average shall be recorded each month, as well as the average for the last twelve months. These records shall be kept on site and available for inspection by the Air Quality Division. The average hexane emissions above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Air Quality Division, Enforcement Section. A report showing the average hexane emissions for the preceding calendar year shall be submitted to the Air Quality Division by February 15.
6. The Acid Wash Temporary Solvent Storage Tank, Emission Point 67-89, shall comply with all applicable provisions of New Source Performance Standards, 40 CFR 60, Subpart Kb-Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

SPECIFIC CONDITIONS

**ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA**

7. The Addis Plant shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63, Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group I Polymers and Resins.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The attached data and/or Emission Inventory Questionnaire sheets establish the emission and operating limitations and are a part of the permit. The synopsis and data sheets are based on the application and Emission Inventory Questionnaire dated September 11, 1996, as well as additional information dated March 27, 1997.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- V. The permittee shall submit semi-annual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Louisiana Air Quality Division.
- VI. The permittee shall notify the Department of Environmental Quality, Air Quality Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.
- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Division's test manual or any other methods approved by the U.S. EPA. Any deviation from or modification of the methods used for testing shall have prior approval from the Louisiana Air Quality Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate, but in no event later than 180 days after initial start-up (or restart-up after modification). The Air Quality Division Surveillance Section shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Division within forty-five (45) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up of each project or unit, report to the Louisiana Air Quality Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Air Quality Division with the following information in writing within five (5) days of such conditions:
- A. Description of noncomplying emission(s);
 - B. Cause of noncompliance;
 - C. Anticipated time the noncompliance is expected to continue, or, if corrected, the duration of the period of noncompliance;
 - D. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 - E. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.
- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919.E as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Louisiana Air Quality Division, within ninety (90) days after the event, to amend this permit.
- XVII. Typical emissions associated with routine operations that are under control upon release, that are predictable in nature, and that are quantifiable as described in this permit application, are considered authorized discharges. Any significant deviation from the emissions specified in the permit application for such discharges, by event, shall be reported to the department according to LAC 33:I.3901. Actual emissions resulting from such activities must be reported to the department on an annual basis. These emissions are not reflected in the permit totals as they are short term and/or intermittent in duration and have no significant impact on air quality. Examples of such events include but are not limited to cleaning equipment, startups, shutdowns, opening off-line equipment (dual units), and releases to control devices such as flares or incinerators. This permit condition does not authorize the maintenance of a nuisance or a danger to public health and safety.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Attention: Assistant Secretary, DLAE
La. Dept. of Environmental Quality
Office of the Secretary
Post Office Box 82263
Baton Rouge, Louisiana 70884-2263

AIR QUALITY DATA SHEET
PAGE 1

ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA

Location of plant: 15 UTM: 667.90 Km E 3357.40 Km N

Description of location: One mile south of Addis, Louisiana

Estimated starting date of construction: NA

Estimated starting operation will begin: July 1997

Type of Dispersion Calculations Used: NA

EFFECTS ON AMBIENT AIR

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Air Quality Standard (NAAQS)
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NEW OR MODIFIED X EMISSION SOURCES Rubber Production
(Type of Source)

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	H/D	Operating Schedule	
				D/W	W/Y
4-78	Dry Recycle Hexane Manaway	NA	24	7	52
7-78	Natural Gas K.O. Drain	NA	24	7	52
8-78	Fresh Hexane Tank	27,600 gal	24	7	52
9-78	EN Tank Manaway	54,000 gal	24	7	52
10-78	EN Slop Storage	15,500 gal	24	7	52
13-78	Stripper Shaker Screen	NA	24	7	52
14-78	Drain Coagulator O/H Decanter E.P. No. 1	NA	24	7	52
15-78	Recycle Water Tank Overflow	NA	24	7	52
16-78	Wet Wash Solvent Surge	15,000 gal	24	7	52
18-78	Tramp Stripper Outfall E.P. No. 1	NA	24	7	52
19-78	Hexane Surge Tank	34,300 gal	24	7	52
20-80	Low Pressure Vent	NA	24	7	52
21-80	Toluene Storage Tank	8,600 gal	24	7	52
22-80	Gasoline Storage Tank	2,500 gal	24	7	52

AIR QUALITY DATA SHEET
PAGE 1

ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			H/D	D/W	W/Y
23-80	Catalyst Make-Up A	4360 gal	24	7	52
24-81	Catalyst Make-Up B	4360 gal	24	7	52
25-81	Catalyst Make-Up TLA A	4360 gal	24	7	52
26-81	Catalyst Make-Up TLA B	4360 gal	24	7	52
27-81	A. O. Make-Up Tank	800 gal	24	7	52
28-81	MI Make-Up Tank A	8400 gal	24	7	52
29-81	Alkyl Storage Tank	17,100 gal	24	7	52
30-81	Alkyl Blend Tank	29,933 gal	24	7	52
31-81	Hexane Tank O.A. No. 1	34,300 gal	24	7	52
32-81	Addis Plant Flare	NA	24	7	52
33-81	EN Recovery Jet	NA	24	7	52
34-81	Finishing Line, North, No. 9 Dryer	56 MM lbs/yr	24	7	52
35-81	Finishing Line, South, No. 8 Dryer	56 MM lbs/yr	24	7	52
36-81	Oleum Storage Tank	12,000 gal	24	7	52
37-81	Hydrochloric Acid Storage Tank	7700 gal	24	7	52
38-82	Finishing Line, Third, No. 7 Dryer	56 MM lbs/yr	24	7	52
39-82	Stripper Shaker Screen, Third Line	NA	24	7	52
40-82	Aluminum Alkyl Storage TEA	900 gal	24	7	52
41-82	MI Make-Up B	8428 gal	24	7	52
43-82	NVP Storage Tank	8130 gal	24	7	52
44-82	Dicumyl Peroxide Storage	NA	24	7	52
45-83	Boiler No. 1	119 MM BTU/hr	24	7	52
46-83	Boiler No. 2	119 MM BTU/hr	24	7	52
48-86	Tramp Stripper Outfall, TLA Plant	NA	24	7	52
49-88	RD Storage Tank	8400 gal	24	7	52
50-88	Neat MI Storage Tank	6000 gal	24	7	52
51-88	A.O. Feed Tank, EP No. 2	800 gal	24	7	52
52-88	Alkyl Feed Tank, EP No. 1	800 gal	24	7	52
53-88	Alkyl Feed Tank, OA No. 1	1000 gal	24	7	52
54-88	MI Make-Up Tank, EP No. 2	1000 gal	24	7	52
55-88	Tramp Stripper Outfall, EP No. 2	NA	24	7	52

AIR QUALITY DATA SHEET
PAGE 1

ADDIS PLANT, DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA

Emission Point No.	Description	Operating Rate (Max) or Tank Capacity	Operating Schedule		
			H/D	D/W	W/Y
56-88	Alkyl Feed Tank, EP No. 2	1300 gal	24	7	52
57-88	Catalyst Make-Up Tank A, EP No. 2	4360 gal	24	7	52
58-88	Catalyst Make-Up Tank B, EP No. 2	4360 gal	24	7	52
59-88	Low Pressure Vent, EP No. 2	NA	24	7	52
60-88	Maleic Anhydride Storage Tank	75,200 gal	24	7	52
61-88	Finishing Building Expeller, North, No. 9	2000 cfm	24	7	52
62-88	Finishing Building Expeller, South, No. 8	2000 cfm	24	7	52
63-88	Finishing Building Expeller, Third, No. 7	2000 cfm	24	7	52
64-88	Propylene Sphere	155,000 gal	24	7	52
65-88	Propane Storage Tank	30,000 gal	24	7	52
66-89A	Cement Spheres A	16,600 gal	24	7	52
66-89B	Cement Spheres B	16,600 gal	24	7	52
66-89C	Cement Spheres C	16,600 gal	24	7	52
67-89	Acid Wash for Temp. Solvent Storage	13,000 gal	Standby		
68-89	NPPDA Storage Tank	15,000 gal	24	7	52
69-90	Wastewater Transfer Storage Tanks	300,175 gal	24	7	52
70-90	Oil Additives Storage Tanks, Non-VOC	8.67 MM gal	24	7	52
71-90	Oil Additives Storage Tanks, Non-VOC	169,550 gal	24	7	52
72-90	Stripper Shaker Screen, EP No. 2	NA	24	7	52
73-90	Finishing Building Expeller, Fourth, No. 10	2900 cfm	24	7	52
74-90	Finishing Line, Fourth, No. 10	80 MM lbs/yr	24	7	52
75-93	Hazardous Waste Feed Storage Tank	5000 gal	24	7	52
98	Propylene Purification System Fugitives	NA	24	7	52
99	Addis Plant Fugitives	NA	24	7	52

[illegible]

LOUISIANA

SINGLE POINT SOURCE/ AREA SOURCE

EMISSION INVENTORY QUESTIONNAIRE (EIQ)

FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submission September 17, 1996	
Source ID number 9-78		Descriptive name of the equipment served by this stack or vent EN TANK MANWAY			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no.		() 15 Horizontal Coordinate 918,114 m E () 16 Vertical Coordinate 3187,318 m N			
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft²) N/A	Stack gas exit temperature (F) N/A	Stack gas flow at process conditions not at standard (ft³/min) N/A	Stack gas exit velocity (ft/s) N/A
					For tanks, list volume (gals) 54,000
Type of fuel used and heat input (see instructions)		Percent of annual throughput of pollutants through this emission point		Normal operating time of this point	
Type of Fuel N/A		Dec-Feb 25		Normal operating time of this point	
Heat Input (MM BTU/hr) N/A		Mar-May 25		hrs/ day 24	
		Jun-Aug 25		days/ week 7	
		Sep-Nov 25		weeks/ year 52	
Fuel a b c				Normal operating rate 1,870,000	

Air Pollutant Specific Information					
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Emission estimation method
			Average (lbs/hr)	Maximum (lbs/hr)	
particulate matter					Concentration in gases exiting at stack g/std ft²
sulfur dioxide					ppm by vol
nitrogen dioxide					ppm by vol
carbon monoxide					ppm by vol
total NM/NE HC (incl. those listed below)	092	100	0.04	0.50	ppm by vol
					ppm by vol
					ppm by vol
					ppm by vol



**SINGLE POINT SOURCE/AREA SOURCE
EMISSION INVENTORY QUESTIONNAIRE (EIQ)
FOR AIR POLLUTANTS**

Company Name		DSM Copolymer, Inc.		Plant Location (if any)		Addis, La Addis Plant		Date of Submittal		September 5, 1986		
Source ID number		10-78		Descriptive name of the equipment served by this stack or vent		EN SLOP STORAGE		Location of stack or vent (see instructions on how to determine location of area sources)		UTM zone no. [] 16 Horizontal Coordinate 948,992 m E [] 16 Vertical Coordinate 3387,394 m N		
Stack and Discharge Physical Characteristics		Height of stack above grade (ft) <u>Q</u>		Diameter (ft) or stack discharge area (ft²) [] ft [] ft² <u>N/A</u>		Stack gas exit temperature (°F) <u>N/A</u>		Stack gas flow at process conditions not at standard (ft³/min) <u>N/A</u>		Stack gas exit velocity (ft/s) <u>N/A</u> For tanks, list volume (gals) <u>15,600</u>		
Type of fuel used and heat input (see instructions)		Heat input (MM BTU/hr) <u>N/A</u>		Operating Characteristics		Percent of annual throughput of pollutants through this emission point		Normal operating time of this point		Normal operating rate		
Fuel		Type of Fuel	<u>N/A</u>			Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	hrs/day	days/week	weeks/year
a	<u>-</u>											
b												
c												
Air Pollutant Specific Information												
Pollutant		Control equipment code	Control equipment efficiency	Emission Rate			Emission estimation method	Add, change, or delete code	Concentration in gases exiting at stack grid #			
				Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)			ppm by vol			
particulate matter									ppm by vol			
sulfur dioxide									ppm by vol			
nitrogen dioxide									ppm by vol			
carbon monoxide									ppm by vol			
total NMNE HC (incl. those listed below)		048	97.0	0.34	0.68	1.50	3		ppm by vol			
n-Hexane		048	97.0	0.20	0.40	0.88			ppm by vol			
Toluene		048	97.0	0.07	0.14	0.31			ppm by vol			
Carbon Canister on the outlet vent of this tank												

[illegible]

LOUISIANA
SINGLE POINT SOURCE/ AREA SOURCE
EMISSION INVENTORY QUESTIONNAIRE (EIQ)
FOR AIR POLLUTANTS

[illegible]



LOUISIANA
SINGLE POINT SOURCE/ AREA
EMISSION INVENTORY QUESTIONNAIRE
FOR AIR POLLUTANTS

Company Name		Plant Location (if any)		Date of Submission							
DSM Copolymer, Inc.		Addis, La		September 5, 1996							
Source ID number		Descriptive name of the equipment served by this stack or vent		Location of stack or vent (see instructions on how to determine location of area sources)							
18-78		TRAMP STRIPPER OUTFALL E.P. #1		UTM zone no. [] 15 Horizontal Coordinate 987,897 m [] 16 Vertical Coordinate 2357,235 m							
Stack and Discharge Physical Characteristics	Height of stack above grade (ft)	Diameter (ft) or stack discharge area (ft ²)	Stack gas exit temperature (F)	Stack gas flow at process conditions not at standard (ft ³ /min)	Stack gas exit velocity (ft/s)	For tanks, list volume (gals)					
	0	N/A	N/A	N/A	N/A	N/A					
	Type of fuel used and heat input (see instructions)	Operating Characteristics									
	Type of Fuel	Heat input (MM BTU/hr)	Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	Normal operating time of this point				
Fuel	a	N/A			28	28	28	hrs/ day	days/ week	weeks/ year	Normal operating rate
	b							28	28	28	
	c										165,160,000
Air Pollutant Specific Information											
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate			Emission estimation method	Add, change, or delete code	Concentration in gas exiting at stack			
			Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)						
particulate matter								gr/ft ³			
sulfur dioxide								ppm by vol			
nitrogen dioxide								ppm by vol			
carbon monoxide								ppm by vol			
total NMNE HC (incl. those listed below)	047	98.0	0.08	0.24	0.34	2		ppm by vol			
n-Hexane	047	98.0	0.05	0.15	0.22	2		ppm by vol			

Date of Submittal **September 5, 1998**

Location of stack or vent (see instructions on how to determine location of area sources)

[[15	Horizontal Coordinate	<u>669,014</u>	m E
[[10	Vertical Coordinate	<u>3357,239</u>	m N

Air Pollutant Specific Information

[illegible]

Company Name	DSM Copolymer, Inc.	Plant Location (if any)	Addis, La	Addis Plant	Date of Submittal	September 5, 1986				
Source ID number	20-80	Descriptive name of the equipment served by this stack or vent				Location of stack or vent (see instructions on how to determine location of area sources)				
						UTM zone no. [] 15 Horizontal Coordinate 657,123 m E [] 16 Vertical Coordinate 3357,189 m N				
LOW PRESSURE VENT										
Stack and Discharge Physical Characteristics	Height of stack above grade (ft)	Diameter (ft) or stack discharge area (ft²)	Stack gas exit temperature (F)	Stack gas flow at process conditions not at standard (ft³/min)	Stack gas exit velocity (ft/sec)	For tanks, list volume (gals)				
							N/A	N/A	N/A	N/A
Type of fuel used and heat input (see instructions)	Type of Fuel	Heat Input (MM BTU/hr)	Operating Characteristics							
a	N/A	N/A	Percent of annual throughput of pollutants through this emission point							
b							Dec-Feb	Mar-May	Jun-Aug	Sep-Nov
c							25	28	25	25
			Normal operating time of this point				Normal operating rate			
			hrs/day	days/week	weeks/year					
			24	7	52		438,666,228			
Air Pollutant Specific Information										
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Emission estimation method	Add, change, or delete code	Concentration in gases exiting at stack			
palladiate matter			Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)		grains ft³			
sulfur dioxide							ppm by vol			
nitrogen dioxide							ppm by vol			
carbon monoxide							ppm by vol			
total NM/NE HC (incl. those listed below)	046	98.6	0	1.00	0	2	ppm by vol			
n-Hexane	046	98.6	0	1.00	0	2	ppm by vol			
							ppm by vol			
							ppm by vol			

LOUISIANA
SINGLE POINT SOURCE/AREA SOURCE
EMISSION INVENTORY QUESTIONNAIRE (EIQ)
FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submittal September 5, 1996	
Source ID number 21-80		Descriptive name of the equipment served by this stack or vent TOLUENE STORAGE TANK			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. [] 16 Horizontal Coordinate 987,955 m E [] 16 Vertical Coordinate 337,209 m N					
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft²) N/A	Stack gas exit temperature (F) N/A	Stack gas flow at process conditions not at standard (ft³/min) N/A	Stack gas exit velocity (ft/s) N/A
	For tanks, list volume (gals) 8,600				
Type of fuel used and heat input (see instructions)		Percent of annual throughput of pollutants through this emission point			
Fuel		Operating Characteristics		Normal operating time of this point	
		Heat input (MM BTU/hr)		Normal operating rate	
		Type of Fuel		week/ year	
		N/A		52	
		N/A		187,142	
Air Pollutant Specific Information					
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Add, change, or delete code
			Average (lb/hr)	Maximum (lb/hr)	
particulate matter					gr/ft³
sulfur dioxide					ppm by vol
nitrogen dioxide					ppm by vol
carbon monoxide					ppm by vol
total NM/NE HC (incl. those listed below)	093	95.0	0.05	0.10	ppm by vol
Toluene	093	95.0	0.05	0.22	ppm by vol
				0.22	ppm by vol
					ppm by vol
					ppm by vol

LOUISIANA
SINGLE POINT SOURCE/ AREA SOURCE
EMISSION INVENTORY QUESTIONNAIRE (EIQ)
FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submittal September 5, 1996	
Source ID number 22-80		Descriptive name of the equipment served by this stack or vent GASOLINE STORAGE TANK			
		Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. () 16 Horizontal Coordinate 947,828 m E () 16 Vertical Coordinate 2317,893 m N			
Stack and Discharge Physical Characteristics		Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft²) N/A	Stack gas exit temperature (F) N/A	Stack gas flow at process conditions not at standard (ft³/min) N/A
Stack gas exit velocity (ft/s) N/A		Stack gas exit velocity (ft/s) N/A		For tanks, list volume (gals) 2,500	
Fuel		Operating Characteristics			Normal operating rate
		Percent of annual throughput of pollutants through this emission point			
		Dec-Feb 25	Mar-May 25	Jun-Aug 21	
		Sep-Nov 21	Nov/Dec 24	days/week 7	
Type of fuel used and heat input (see instructions)		Heat input (MM BTU/hr) N/A		Normal operating time weeks/year 52	
Type of Fuel a N/A b c					

Air Pollutant Specific Information					
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Concentration in gases exiting at stack
			Average (lb/hr)	Maximum (lb/hr)	
particulate matter					grated ft³
sulfur dioxide					ppm by vol
nitrogen dioxide					ppm by vol
carbon monoxide					ppm by vol
total NM/NE HC (incl. those listed below)	047, 004	99.9	0.01	0.06	ppm by vol
					ppm by vol
					ppm by vol
					ppm by vol

LOUISIANA

SINGLE POINT SOURCE/AREA SOURCE

EMISSION INVENTORY QUESTIONNAIRE (EIQ)

FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La		Date of Submission September 6, 1988	
Source ID number 24-81		Descriptive name of the equipment served by this stack or vent CATALYST MAKE-UP B			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. () 15 Horizontal Coordinate 887,921 m E () 16 Vertical Coordinate 3387,224 m N					
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft²) N/A () ft²	Stack gas exit temperature (°F) N/A	Stack gas flow at process conditions not at standard (ft³/min) N/A	Stack gas exit velocity (ft/s) N/A
					For tanks, list volume (gals) 4,360
Type of fuel used and heat input (see instructions)		Operating Characteristics		Normal operating time of this point	
Type of Fuel		Percent of annual throughput of pollutants through this emission point		Normal operating rate	
Heat Input (MM BTU/hr)		Dec-Feb		days/week	
a N/A		Mar-May		hrs/day	
b		Jun-Aug		weeks/year	
c		Sep-Nov			
		Dec-Feb			
		Mar-May			
		Jun-Aug			
		Sep-Nov			
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Company Name		DSM Copolymer, Inc.		Plant Location (if any)		Addis, La		Addis Plant		Date of Submittal		September 5, 1998	
Source ID number		25-51		Descriptive name of the equipment served by this stack or vent				Location of stack or vent (see instructions on how to determine location of area sources)				Location of stack or vent (see instructions on how to determine location of area sources)	
Stack and Discharge Physical Characteristics		Height of stack above grade (ft)		Diameter (ft) or stack discharge area (ft²)		Stack gas exit temperature (F)		Stack gas flow at process conditions not at standard (ft³/min)		Stack gas exit velocity (ft/s)		For tanks, list volume (gals)	
CATALYST MAKE-UP TLA		0		N/A		N/A		N/A		N/A		4,390	
Type of fuel used and heat input (see instructions)		Type of Fuel		Heat input (MM BTU/hr)		Percent of annual throughput of pollutants through this emission point				Normal operating time of this point		Normal operating rate	
Fuel		a		N/A		Dec-Feb		Mar-May		Jun-Aug		Sep-Nov	
b		N/A		N/A		25		25		25		25	
c		N/A		N/A		25		25		25		25	
Operating Characteristics		Average (lb/hr)		Maximum (lb/hr)		Annual (tons/yr)		Emission estimation method		Add, change, or delete code		Concentration in gases exiting at stack	
particulate matter		Control equipment code		Control equipment efficiency		093		99.9		0.37		2.50	
sulfur dioxide		Control equipment code		Control equipment efficiency		093		99.9		0.22		1.50	
nitrogen dioxide		Control equipment code		Control equipment efficiency		093		99.9		0.22		1.50	
carbon monoxide		Control equipment code		Control equipment efficiency		093		99.9		0.22		1.50	
total NM/NE HC (incl. those listed below)		Control equipment code		Control equipment efficiency		093		99.9		0.22		1.50	
n-Hexane		Control equipment code		Control equipment efficiency		093		99.9		0.22		1.50	

LOUISIANA SINGLE POINT SOURCE/AREA SOURCE EMISSION INVENTORY QUESTIONNAIRE (EIQ) FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La		Addis Plant		Date of Submittal September 5, 1996	
Source ID number 26-81		Descriptive name of the equipment served by this stack or vent CATALYST MAKE-UP TLAB					
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. () 15 Horizontal Coordinate 887,877 m E () 16 Vertical Coordinate 2387,251 m N							
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft ²) N/A	Stack gas exit temperature (F) N/A	Stack gas flow at process conditions not at standard (ft ³ /min) N/A	Stack gas exit velocity (ft/s) N/A	For tanks, list volume (gals) 4,360	
Type of fuel used and heat input (see instructions)		Operating Characteristics		Percent of annual throughput of pollutants through this emission point		Normal operating time	
Type of Fuel		Heat input (MM BTU/hr)		Dec-Feb	Mar-May	Jun-Aug	Sep-Nov
a		N/A		28	25	25	25
b							
c							
Fuel				hr/d	days/week	weeks/year	Normal operating rate
				24	7	52	1,095,000

Air Pollutant Specific Information						
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Add, change, or delete code	Concentration in gases exiting at stack gr/d ft ³
			Average (lb/hr)	Maximum (lb/hr)		
particulate matter						ppm by vol
sulfur dioxide						ppm by vol
nitrogen dioxide						ppm by vol
carbon monoxide						ppm by vol
total NM/NE HC (incl. those listed below)	083	99.9	0.37	2.50	3	ppm by vol
n-Hexane	083	99.9	0.22	1.50	3	ppm by vol
						ppm by vol
						ppm by vol

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LOUISIANA

SINGLE POINT SOURCE/ AREA SOURCE

EMISSION INVENTORY QUESTIONNAIRE (EIQ)

FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submittal September 5, 1996	
Source ID number 29-01		Descriptive name of the equipment served by this stack or vent ALKYL STORAGE TANK			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. <input type="checkbox"/> 15 Horizontal Coordinate 988,022 m E <input type="checkbox"/> 16 Vertical Coordinate 3197,319 m N					
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft ²) N/A	Stack gas exit temperature (°F) N/A	Stack gas flow at process conditions not at standard (ft ³ /min) N/A	Stack gas exit velocity (ft/s) N/A
					For tanks, list volume (gals) 17,100
Type of fuel used and heat input (see instructions)		Operating Characteristics		Normal operating rate	
Type of Fuel		Percent of annual throughput of pollutants through this emission point		Normal operating time of this point	
Heat Input (MM BTU/hr)		Dec-Feb		days/ week	
a		Mar-May		hrs/ day	
b		Jun-Aug		weeks/ year	
c		Sep-Nov			
		25		25	
		25		7	
		25		52	
		25		1,890,100	
Air Pollutant Specific Information					
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Add, change, or delete code
			Average (lb/hr)	Maximum (lb/hr)	Concentration in gases exiting at stack
petroleum matter					gr/std ft ³
sulfur dioxide					ppm by vol
nitrogen dioxide					ppm by vol
carbon monoxide					ppm by vol
total NMNE HC (incl. those listed below)	093	99.0	0.57	5.00	ppm by vol
n-Hexane	093	99.0	0.29	3.00	ppm by vol
					ppm by vol
					ppm by vol

LOUISIANA

SINGLE POINT SOURCE/ AREA SOURCE EMISSION INVENTORY QUESTIONNAIRE (EIQ) FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submission September 4, 1996	
Source ID number 30-91		Descriptive name of the equipment served by this stack or vent ALKYL BLEND TANK			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. [] 15 Horizontal Coordinate 989,838 m E [] 16 Vertical Coordinate 2387,224 m N					
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 0	Diameter (ft) or stack discharge area (ft²) N/A	Stack gas exit temperature (F) N/A	Stack gas flow at process conditions not at standard (m³/min) N/A	Stack gas exit velocity (ft/s) N/A
					For tanks, list volume (gals) 29,933
Type of fuel used and heat input (see instructions)		Operating Characteristics		Normal operating time of this point	
Type of Fuel N/A		Heat Input (MM BTU/hr) N/A		Normal operating rate	
a				hrs/ day	
b				days/ week	
c				weeks/ year	
		Percent of annual throughput of pollutants through this emission point		Normal operating rate	
		Dec-Feb		hrs/ day	
		Mar-May		days/ week	
		Jun-Aug		weeks/ year	
		Sep-Nov		Normal operating rate	
		28		24	
		28		7	
		28		92	
1,689,100					
Air Pollutant Specific Information					
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate		Add, change, or delete code
			Average (lb/hr)	Maximum (lb/hr)	Concentration in gases exiting at stack grid ft²
particulate matter					ppm by vol
sulfur dioxide					ppm by vol
nitrogen dioxide					ppm by vol
carbon monoxide					ppm by vol
total NMNE HC (incl. those listed below)	093	99.0	0.49	5.00	ppm by vol
n-Hexane	093	99.0	0.29	3.00	ppm by vol
					ppm by vol
					ppm by vol

[illegible]

[illegible]

LOUISIANA

SINGLE POINT SOURCE/ AREA SOURCE EMISSION INVENTORY QUESTIONNAIRE (EIQ) FOR AIR POLLUTANTS

Company Name DSM Copolymer, Inc.		Plant Location (if any) Addis, La Addis Plant		Date of Submittal September 4, 1998	
Source ID number 34-01		Descriptive name of the equipment served by this stack or vent FINISHING LINE (North) (Dryer)			
Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. 11 15 Horizontal Coordinate 887,842 m E 11 16 Vertical Coordinate 3357,122 m N					
Stack and Discharge Physical Characteristics	Height of stack above grade (ft) 39	Diameter (ft) or stack discharge area (ft²) 2.0 (ft) (ft²)	Stack gas exit temperature (°F) 120	Stack gas flow at process conditions not at standard (ft³/min) 10,000	Stack gas exit velocity (ft/s) 52
					For tanks, list volume (gals) N/A
Type of fuel used and heat input (see instructions)		Operating Characteristics		Percent of annual throughput of pollutants through this emission point	
Type of Fuel		Heat input (MM BTU/hr)		Normal operating time of this point	
a. N/A		N/A		days/ week	
b.				hrs/ day	
c.				Sep-Nov	
				Dec-Feb	
				Mar-May	
				Jun-Aug	
				Sep-Nov	
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LOUISIANA

SINGLE POINT SOURCE/ AREA SOURCE EMISSION INVENTORY QUESTIONNAIRE (EIQ) FOR AIR POLLUTANTS



Company Name DSM Copolymer, Inc.						Plant Location (if any) Addis, La Addis Plant			Date of Submittal September 4, 1986			
Source ID number 35-01		Descriptive name of the equipment served by this stack or vent FINISHING LINE (South) (#9 DRYER)							Location of stack or vent (see instructions on how to determine location of area sources) UTM zone no. [] 15 Horizontal Coordinate 187.108 m E [] 16 Vertical Coordinate 3187.189 m N			
Stack and Discharge Physical Characteristics #		Height of stack above grade (ft) 39	Diameter (ft) or stack discharge area (ft²) 2.0 [] ft² [] ft²	Stack gas exit temperature (°F) 120	Stack gas flow at process conditions not at standard (ft³/min) 10,000	Stack gas exit velocity (m/s) 53	For tanks, list volume (gals) N/A					
Fuel		Type of fuel used and heat input (see instructions)			Percent of annual throughput of pollutants through this emission point			Normal operating time of this point		Normal operating rate		
		Type of Fuel	Heat Input (MM BTU/hr)		Dec-Feb	Mar-May	Jun-Aug	Sep-Nov	hrs/day		days/week	weeks/year
		a	N/A	N/A	28	28	28	28	24		1	92
		b										
c												
Air Pollutant Specific Information												
Pollutant	Control equipment code	Control equipment efficiency	Emission Rate			Emission estimation method	Add, change, or delete code	Concentration in gases existing at stack				
paticulate matter	001	99.0	Average (lb/hr)	Maximum (lb/hr)	Annual (tons/yr)	3		gr/d ft³				
sulfur dioxide			0.13	0.40	0.59			ppm by vol				
nitrogen dioxide								ppm by vol				
carbon monoxide								ppm by vol				
total NMINE HC (not those listed below)	048	99.7	11.30	42.24	49.47	2		ppm by vol				
n-Hexane	046	99.7	6.78	25.34	29.89			ppm by vol				
Toluene	046	99.7	2.26	8.45	9.89			ppm by vol				



LOUISIANA
SINGLE POINT SOURCE/ AREA SOURCE
EMISSION INVENTORY QUESTIONNAIRE (EIQ)
FOR AIR POLLUTANTS

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